



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 12, 2022

VIA ECF

Hon. John G. Koeltl  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

*Time to respond to the  
petition extended to February 17, 2023.  
The 1/24/23 conference is canceled.  
The parties should provide a*

**Re: *Revkolevsky v. U.S. Citizenship and Immigration Services, et al.*, 22 Civ. 7444 (JGK)**

Dear Judge Koeltl:

This Office represents the government in this action in which the petitioner seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate a Petition by Investor to Remove Conditions on Permanent Resident Status (Form I-829). I write respectfully in response to the Court's October 19, 2022 order requiring the government to respond to the petition by December 19, 2022. ECF No. 10. I respectfully request a sixty-day extension of the time to respond to the petition (*i.e.*, from December 19, 2022, to February 17, 2023). In addition, I respectfully request that the initial status conference presently scheduled for January 24, 2023, be rescheduled to the week of March 6, 2023, or thereafter (with a corresponding extension of time for the preconference submission).

*Status report to the Court by  
February 24, 2023. So ordered  
12/12/22*

I respectfully request this extension and adjournment because this Office was not aware of this case and only learned of the petition last week through USCIS. Although the affidavits of service state that this Office received service on September 26, 2022, we have not yet located service and apologize if the documents were misplaced or misrouted. Additionally, the government needs time to review the petition, confer with USCIS, and determine next steps. This is the government's first request for an extension and adjournment. The petitioner consents to these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: s/ Jacqueline Roman  
JACQUELINE ROMAN  
Special Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (347) 714-3363  
E-mail: jacqueline.roman@usdoj.gov

*Attorney for Respondents*

cc: Counsel of record (via ECF)